REMARKS

Reconsideration of the application in light of the amendments and the following remarks is respectfully requested.

Status of the Claims

Claims 1-22 are pending. Claims 9 and 18 have been amended. Claims 19-22 have been added. No new matter has been added.

Status of the Specification

In accordance with 37 C.F.R. § 1.121, two paragraphs have been replaced to amend errors of a typographical nature. Specifically, at page 2, line 12, the number reading "6" was changed to read "16" which is the sum of the bits R:G:B=5:6:5. At Page 10, line 11, the word "special" was changed to "spatial" which conforms with the context of the paragraph. No new matter has been added.

Rejection Under 35 U.S.C. § 102

Claims 1, 9, 11 and 18 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,469,190 to Masterson.

The Examiner contends that Masterson discloses a display device comprising a pseudo-tone processing means which receives display data and color-reduces each RGB

component by pseudo-tone processing, a frame memory, and a drive means for driving the display device. Applicants submit that Masterson also discloses that "a fully saturated shade of red is represented when all of the bits of the red component are ones and all of the bits of the green and blue components are zeroes. The absence of any red component is represented when all of the bits of the red component are zeroes." (Masterson, column 3, lines 37-41.)

The present application describes "a pseudo-tone processing means which receives inputs of display data and color-reduces each RGB component of said display by means of pseudo-tone processing." The tone numbers of each RGB component become G>R>B after the pseudo-tone processing means performs color reduction. (Application, page 8, lines 1-15.)

Claim 1 recites the feature of "a pseudo-tone processing means" and claim 11 recites a method comprising the step of "color-reducing each RGB component of said display data by means of pseudo-tone processing." In accordance with the structure disclosed in the Specification, the pseudo-tone processing means results in tone numbers where G>R>B. In contrast Masterson discloses that the R component can be greater than the G component, and that the G component can equal the B component. Applicants submit that Masterson fails to disclose that G>R>B. Also, Masterson fails to disclose that the tone number of the R component, G component, and B component should be different from the other of those, so that the tone number reflects a contribution of each of RGB components to brightness. Therefore, Applicants submit that Masterson does not disclose each and every feature of claims 1 and 11.

Amended claim 9 now recites "at least one bit conversion table containing tone corrections that include least significant bits" and amended claim 18 now recites the step of "performing the bit-incrementing step in a tone correction means located downstream from the frame memory; wherein the tone correction means references at least one bit conversion table." In contrast to performing tone corrections that include least significant bits, Masterson discloses that "the conversion is simply accomplished by concatenating three additional zeroes to the least significant end of the five bits of data stored for each component of each pixel." (Masterson, column 6, lines 10-17, and Figs. 4 and 6.) Applicants submit that Masterson fails to disclose a tone correction means and a bit conversion table. Additionally, by forcing the least significant bits to zero, Masterson is unable to provide color values for the pixel components which change smoothly in halftones so that irregular colors become conspicuous. Therefore, Applicants submit that Masterson does not disclose each and every element of amended claims 9 and 18.

For the foregoing reasons Applicants submit that Masterson does not anticipate the inventions of claims 1, 9, 11 and 18. Withdrawal and reconsideration of the rejection is requested.

Claims 1, 2, 10 and 11 stand rejected under 35 U.S.C. § 102(b0 as being anticipated by U.S. Patent No. 5,170,152 to Taylor. The Examiner contends that Taylor discloses a display device comprising a pseudo-tone processing means, a frame memory and a drive means. Applicants respectfully traverse this rejection.

Applicants submit that Taylor discloses an invention where a luminance error is minimized "by adding scaled green and red errors to the blue color intensity signal prior to

encoding." (Taylor, equations 1-5, column 6, line 62 through column 7, line 24.) Taylor discloses that the coefficients C_R, C_G and C_B of equation 1 should reflect the contribution of each RGB component to brightness to reduce visible artifact. However, each of the R, G, and B component themselves has the same tone number. Taylor discloses that the low order bits of the green and red color intensity signals are scaled and then added to the blue color intensity signal.

Claims 1 and 2 each recite the structure of pseudo-tone processing means. Similarly, claims 10 and 11 recite methods which perform the step of color reducing by means of pseudo-tone processing. The pseudo-tone processing means has at least the equivalent structure described in the Application as discussed above. Therefore, the tone numbers of each RGB component become $G>R>B$ after the pseudo-tone processing means performs color reduction. In contrast, Taylor discloses that each RGB component has the same tone number. Applicants submit that Taylor fails to disclose each and every element of claims 1, 2, 10 and 11. Therefore, Applicants request withdrawal and reconsideration of the rejection.

Rejection Under 35 U.S.C. § 103

Claims 3-8 and 12-17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Taylor in view of U.S. Patent No. 4,725,828 to Cowlishaw. Applicants respectfully traverse this rejection.

The Examiner acknowledges that Taylor fails to disclose the tone number of the G component after color reduction is from about two to about 20 times the tone number of the B

component, and that R:G:B=2:4:1 or R:G:B=16:32:8. The Examiner contends that Cowlishaw discloses such ratios and that it would have been obvious for a person of ordinary skill in the art at the time of the invention to have combined Taylor and Cowlishaw to achieve the present inventions of claims 2-8 and 12-17.

Applicants submit that Taylor discloses a system where a luminance error is minimized "by adding scaled green and red errors to the blue color intensity signal prior to encoding." (Taylor, equations 1-5, column 6, line 62 through column 7, line 24.) Taylor discloses that the tone numbers of RGB components are identical. Therefore, there is no motivation in Taylor to adjust the tone numbers of the RGB components based on the contribution of each RGB component to brightness. Applicants submit that the Examiner has combined Taylor and Cowlishaw using hindsight gleaned from the invention itself. The use of such hindsight is impermissible in forming a *prima facie* case of obviousness. Therefore, Applicants request withdrawal and reconsideration of the rejection.

CONCLUSION

Each and every point raised in the Office Action dated January 16, 2004 has been addressed on the basis of the above amendments and remarks. In view of the foregoing it is believed that claims 1-22 are in condition for allowance and it is respectfully requested that the application be reconsidered and that all pending claims be allowed and the case passed to issue.

If there are any other issues remaining which the Examiner believes could be resolved through a Supplemental Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned at the telephone number indicated below.

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Respectfully submitted,

By _____

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Attachment A